

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue, Suite 900 Seattle, WA 98101-3140

OFFICE OF ENVIRONMENTAL CLEANUP

December 21, 2015

Mr. Matt McClincy Oregon Department of Environmental Quality Northwest Region 700 NE Multnomah St., Suite 600 Portland, Oregon 97232-4100

Re: EPA Review of Final Source Control Decision (SCD) for Christenson Oil Company,

ECSI #2426, Portland, Oregon

Dear Mr. McClincy:

The Environmental Protection Agency has completed its review of the Final Source Control Decision for Christenson Oil Company. Based on the information provided, EPA agrees that Source Control Measures at this site are largely reducing the potential for recontamination of the Willamette River within the Portland Harbor Superfund Site (PHSS). However, we still have concerns about elevated levels of contaminants such as BEHP, PAHs, and certain metals that exceed Screening Level Values (SLVs) and Preliminary Remediation Goals (PRGs). As recognized by our Joint Source Control Strategy (JSCS), the exceedance of an SLV itself does not constitute a need for further source control. However, further monitoring, beyond what is required under the NPDES 1200Z stormwater permit, may be necessary to determine the effectiveness of the control.

Because stormwater runoff from this site discharges to Area of Potential Concern (AOPC) #19 within the Willamette River, further source control may be required should future sampling indicate that pollutants from this upland site are contributing to risk or recontamination of PHSS remedies.

If you have any questions or would like to discuss the contents of this letter further, please feel free to contact me at (206) 553-1970 or demaria.eva@epa.gov.

Sincerely,

Eva DeMaria Remedial Project Manager

cc: Alex Liverman, DEQ/NWR (via email) Kristine Koch, EPA (via email)

Sean Sheldrake, EPA (via email)